

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
BLANK LABEL GROUP, INC. <i>et al.</i> , ¹	Case No. 23-10286 (JTD)
Debtor.	(Jointly Administered)
	Related to Docket Nos. 269 & 285
	Adv. Pro. No. 23-50412 (JTD)
In re:	
BLACK LAPEL CUSTOMER CLOTHIERS, INC.,	Objection Deadline: November 2, 2023 at 4:00 PM (ET) Hearing Date: November 9, 2023 at 1:00 p.m. (ET)
Plaintiff,	
v.	
SETTLE FUNDING, LLC,	
Defendant.	

**SETTLE FUNDING, LLC'S JOINDER TO DEBTORS' REPLY IN SUPPORT OF THE
RULE 9019 MOTION REGARDING THEIR SETTLEMENT AGREEMENT**

Secured creditor Settle Funding, LLC, as servicer (with its affiliates, predecessors, successors, and assigns, individually and collectively, “Settle”), by and through its undersigned counsel, hereby joins the above-captioned debtors’ (the “Debtors”) *Reply* [Docket No. 289] to H.M. Cole, LLC’s (“Buyer”) *Objection of H.M. Cole, LLC to Debtors’ Motion Pursuant to Bankruptcy Code Section 105(a) and Bankruptcy Rule 9019 for Entry of an Order (I) Approving the Settlement Agreement By and Among the Debtors and Settle Funding, LLC and (II) Granting Related Relief* [Docket No. 285] (the “Objection”) and, in support of the *Debtors’ Motion*

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number are as follows Blank Label Group, Inc. (6183); BlackLapel Custom Clothiers, Inc. (3725); and Ratio Clothing, LLC (8330). The Debtors’ mailing address is 36 Broomfield Street, 203, Boston, MA 02108.

*Pursuant to Bankruptcy Code Section 105(a) and Bankruptcy Rule 9019 for Entry of an Order
(I) Approving the Settlement Agreement By and Among the Debtors and Settle Funding, LLC and
(II) Granting Related Relief [Docket No. 269] (the “Motion”).² Additionally, Settle incorporates
by reference its *Response Joining Debtors’ Objection to Motion of H.M. Cole, LLC for Payment
of \$100,000 Transition Management Fee Filed by Settle Funding, LLC* [Docket No. 276] and the
relevant arguments set forth therein.*

WHEREFORE, Settle joins on the Debtors’ Reply to the Objection and respectfully
requests that the Court enter an order granting the Motion.

Dated: November 8, 2023

BRYAN CAVE LEIGHTON PAISNER LLP

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² Capitalized terms not otherwise defined herein are intended to have the meaning set forth in the Motion or the Reply.

CERTIFICATE OF SERVICE

I hereby certify that on November 8, 2023, a true and correct copy of the foregoing pleading was served electronically via CM/ECF and by placing in the United States Mail, postage pre-paid, addressed to the following:

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Subchapter V Trustee

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United States Trustee

/s/ Jarret P. Hitchings
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